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2 | District of Nevada

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## 7 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 PAMELA MARIE CAGLIARI, ) Case No. 2:18-cv-00130-GMN-CWH  
13 Plaintiff, )  
14 v. )  
15 NANCY A. BERRYHILL, ) DEFENDANT'S UNOPPOSED MOTION FOR  
16 Acting Commissioner of Social Security, ) EXTENSION OF TIME (SECOND REQUEST)  
17 Defendant. )

19                   Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant),  
20 respectfully requests a 45-day extension of time, from August 5, 2018 to October 20, 2018, for  
21 Defendant to respond to Plaintiff's Motion for Reversal and/or Remand in this case.

This is Defendant's second request for an extension of time. Defendant's first extension was in connection with submitting the certified administrative record. Defendant respectfully submits that good cause exists for a second extension because Defendant's counsel was out of the office unexpectedly and requires additional time to complete her review and analysis of the record and the

1 issues raised in Plaintiff's motion and to prepare Defendant's response. Defendant's counsel also has  
2 a number of other briefs due and is trying diligently to manage competing workload demands. This  
3 request is made in good faith with no intention to unduly delay the proceedings. Plaintiff's counsel  
4 indicated in an email dated August 31, 2018 that he does not oppose this request for an extension.  
5

6 Respectfully submitted,

7 Dated: August 31, 2018

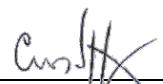
DAYLE ELIESON  
United States Attorney

8 By: /s/ Margaret Branick-Abilla  
9 MARGARET BRANICK-ABILLA  
10 Special Assistant United States Attorney  
Attorneys for Defendant

11 OF COUNSEL TO DEFENDANT:

12 DEBORAH LEE STACHEL  
13 Regional Chief Counsel, Region IX  
Social Security Administration

14  
15 IT IS SO ORDERED:

16  
17   
18 HON. CARL W. HOFFMAN  
UNITED STATES MAGISTRATE JUDGE

19  
20 DATED: September 5, 2018

## **CERTIFICATE OF SERVICE**

I, Margaret Branick-Abilla, certify that the following individual(s) was served with a copy of the **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** on the date and via the method of service identified below:

**CM/ECF:**

Cyrus Safa  
Email: cyrus.safa@rohlfinglaw.com  
Attorney for Plaintiff

Gerald Welt  
Email: gmwesq@weltlaw.com  
Attorney for Plaintiff

Date: August 31, 2018

/s/ Margaret Branick-Abilla  
MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney